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July 5, 2017

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: *In re: General Motors LLC Ignition Switch Litigation*
Case No. 09-50026 (MG)
Letter Regarding Oral Argument on the Late Claims Motion
Threshold Issues**

Dear Judge Glenn:

During the May 17, 2017 hearing on certain of the 2016 Threshold Issues, New GM raised with the Court that oral argument had not yet been scheduled on the Late Claims Motion Threshold Issues. Counsel for the Ignition Switch Plaintiffs then asked the Court to delay setting a date for oral argument because of ongoing settlement discussions between them and the MLC GUC Trust. In response to the Court's question about the timing of that settlement, counsel for plaintiffs responded: "Your Honor, I'm hopeful that, if we are going to have a deal, it's within the next certainly 30 days and maybe before that." (Ex. A, 5/17/17 Bankr. Hr'g Tr. at 266:21-23.) The Court set a deadline of June 16, 2017 for the Ignition Switch Plaintiffs to update the Court in writing on the status of settlement discussions.

One month later, on June 16, 2017, Designated Counsel for the Ignition Switch Plaintiffs submitted a letter to this Court, stating that "discussions are ongoing between the Ignition Switch Plaintiffs, Non-Ignition Switch Plaintiffs, Pre-Closing Accident Plaintiffs, and the GUC Trust, that may obviate the need for scheduling a hearing on the Initial Late Claims Motion Issues. We will provide the Court a further update within the next two weeks." (Ex. B)

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Two weeks later, on June 30, 2017, Designated Counsel submitted another letter, which again stated that “discussions continue between the Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs, certain Pre-Closing Accident Plaintiffs, and the GUC Trust, which may obviate the need for scheduling a hearing on the Initial Late Claims Motion. We will keep the Court closely apprised of further developments.” (Ex. C) This last report is essentially the same report given orally on May 16 and again in writing on June 16, except by not providing a date for further reporting on settlement discussions, plaintiffs have transformed the Court’s directive into an indeterminate adjournment of their Late Claims Threshold Issues motion.

It has been almost seven weeks since plaintiffs’ counsel first suggested a delay in the scheduling of oral argument on the Late Claims Threshold Issues. Based on the above-described circumstances, New GM urges the Court to schedule oral argument at this time.

Respectfully submitted,

/s/ Arthur Steinberg

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